July 30, 2001

Ms. Lisa McCoy
Dalton Corporation, Kendallville Manufacturing Facility
P.O. Box 271
Kendallville, IN 46755

Dear Ms. McCoy:

Re: Exempt Construction and Operation Status,
113-14431-00004

The application from Dalton Corporation, Kendallville Manufacturing Facility, received on May 30, 2001, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following core making operation, to be located at 200 West Ohio Street, Kendallville, Indiana, is classified as exempt from air pollution permit requirements:

One (1) small core machine with maximum sand capacity of 0.00075 tons per hour for laboratory research purposes.

This existing source has submitted their Part 70 application (T113-6491-00004) on August 30, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Any change or modification which may increase the potential PM emissions to five (5) tons per year or more, or VOC emissions to ten (10) tons per year or more, from the equipment covered in this exemption must be approved by the Office of Air Quality (OAQ) before such change may occur.

Sincerely,

Original Signed by Paul Dubenetzky
Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

AY/EVP

cc: File - Noble County
Noble County Health Department
Air Compliance - Doyle Houser
Permit Tracking - Janet Mobley
Air Programs Section- Michelle Boner
Part 70 Application File - T113-6491-00004

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for an Exempted Unit

Source Background and Description

Source Name:	Dalton Corporation, Kendallville Manufacturing Facility
Source Location:	200 West Ohio Street, Kendallville, Indiana 46755
County:	Noble
SIC Code:	3321
Operation Permit No.:	T113-6491-00004
Operationg Prermit Issuance Date:	still pending
Exemption No:	113-14431-00004
Permit Reviewer:	Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed an application from Dalton Corporation, Kendallville Manufacturing Facility relating to the construction and operation of one (1) core machine.

History

On May 30, 2001, Dalton Corporation - Kendallville Manufacturing Facility submitted application to the OAQ requesting to add one (1) small core machine for laboratory research purposes to their existing plant. An application for a Part 70 permit (T113-6491-00004) for the existing source was received on August 30, 1996 and is currently being reviewed by IDEM.

New Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

One (1) small core machine with maximum sand capacity of 0.00075 tons per hour for laboratory research purposes.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on May 30, 2001.

Emission Calculations

The calculations submitted by the applicant have been verified and found to be accurate and correct. These calculations are provided in Appendix A of this document (one (1) page).

Potential To Emit (of Revision) Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	0.00
PM-10	0.00
SO_2	0.00
VOC	0.016
CO	0.00
NO_x	0.00

HAP's	Potential To Emit (tons/year)
TEA	0.014
TOTAL	0.014

(a) The potential to emit of all the regulated pollutants for this modification at the source is lower than the registration applicability thresholds stated in 326 IAC 2-7-10.5(d)(4). Therefore, pursuant to 326 IAC 2-1.1-3(d)(3), this is an exempt unit.

County Attainment Status

The source is located in Noble County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Noble County has been designated as attainment or unclassifiable for ozone. Therefore, VOC and NOx emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Noble County has been classified as attainment or unclassifiable for PM-10, SO_2, Ozone, CO and Lead. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/ or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	greater than 100
PM10	greater than 100
SO_2	less than 100
VOC	greater than 100
CO	greater than 100
NO_x	less than 100

(a) This existing source is a major stationary source because an attainment regulated pollutant is emitted at a rate of 100 tons per year or greater.

(b) These emissions were based upon Airs facility Quick-look data.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source has submitted their Part 70 (T113-6491-00004) application on August 30, 1996. The equipment being reviewed under this permit shall be incorporated in the submitted Part 70 application.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this unit.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61) applicable to this unit.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than one hundred (100) tons per year of PM, PM-10, CO and VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by July 1 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-1-6 (New Facilities, General Reduction Requirements)

The requirement to reduce VOC emissions using the Best Available Control Technology (BACT) does not apply to this unit because VOC emissions are less than twenty-five (25) tons per year.

No other Article 8 rules apply.

Conclusion

The construction and operation of this core machine shall be subject to the conditions of the attached proposed **Exemption 113-14431-00004.**

Appendix A: Emission Calculations: Core Machine

Company Name: Dalton Corporation - Kendallville Manufacturing Facility
Address, City IN : 200 West Ohio Street, Kendallville, Indiana 46755
Permit #: 113-14431-00004
Reviewer: Adeel Yousuf /EVP
Date: June 26, 2001

Process	Maximum Sand Throughput (Tons/hr)	Pollutant	Emission Factor (lb/ton of sand)	Emission Factor Reference	Potential Emissions	Controlled Emissions
Resin	0.00075	VOC	0.65	OCMA	0.002	0.002
TEA gas	0.00075	VOC and HAP	4.2	Mass Balance	0.014	0.0014
Total					**0.016**	**0.016**

OCMA = Ohio Cast Metal Association

Methodology:
Maximum VOC (HAP) emissions (tons/yr) = (Maximum sand throughput (tons/hr)) * (lbs VOC (HAP)/tons of sand) * (1 ton/2000 lbs) * (8760 hours/yr)